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Attorneys for Defendant NexTag, Inc.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

Louis Vuitton Malletier, S.A.,

Plaintiff,

v.

NexTag, Inc., et al.

Defendants.

Case No.: 3:07-cv-03763-MMC

STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO
COMPLETE ADR

STIPULATION

Plaintiff Louis Vuitton Malletier, S.A. ("Louis Vuitton") and Defendant NexTag, Inc. ("NexTag") hereby stipulate and request the Court enter an Order extending the time within which the parties may complete Alternative Dispute Resolution Proceedings in the above-captioned matter:

WHEREAS the Court held a Scheduling Conference on or about November 30, 2007 at which time the parties requested an early Settlement Conference before the Magistrate Judge; and

WHEREAS the Court entered an Order setting an early deadline for completion of ADR and referred settlement proceedings to Magistrate Judge Joseph C. Spero but instructed the parties to inform the Court and to request additional time within which to complete ADR if the status of discovery was such that additional time to prepare for ADR is indicated; and

WHEREAS the parties have exchanged written discovery and responses but each have outstanding issues concerning the discovery responses and document productions of the other; and

WHEREAS an extension of the time within which to complete ADR so that the parties can first resolve their discovery disputes will not have any impact on any of the other dates ordered by the Court at the Scheduling Conference;

NOW, THEREFORE, the parties agree and stipulate that, subject to order of the Court, the deadline within which to complete ADR pursuant to L-R. 16-8 may be extended from April 3, 2008, to June 19, 2008, and the settlement conference before Magistrate Judge Joseph C. Spero currently calendared for April 3, 2008 shall be rescheduled accordingly.

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1 Respectfully submitted,

2 DATED: March 11, 2008

QUINN EMANUEL URQUHART OLIVER &
HEDGES, LLP

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5 By Margret M. Caruso

6 Margret M. Caruso
Attorneys for NexTag, Inc.

7 DATED: March 12, 2008

J. ANDEW COOMBS, A PROFESSIONAL CORP.

8
9 By Andrew Coombs

10 Andrew Coombs
Attorneys for Louis Vuitton Malletier, S.A.

11 **[PROPOSED] ORDER**

12 PURSUANT TO STIPULATION, IT IS ORDERED.
13 DATED: March , 2008

14
15 Hon. Maxine M. Chesney
16 UNITED STATES DISTRICT JUDGE

PROOF OF SERVICE

I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of Los Angeles, and not a party to the above-entitled cause. I am employed by a member of the Bar of the United States District Court of California. My business address is 517 E. Wilson Ave., Suite 202, Glendale, California 91206.

On March 12, 2008, I served on the interested parties in this action with the:

- STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME TO COMPLETE ADR

for the following civil action:

Louis Vuitton Malletier S.A. v. NexTag, Inc., et al.

by placing a true copy thereof in an envelope to be immediately sealed thereafter. I am readily familiar with the office's practice of collecting and processing correspondence for mailing. Under that practice it would be deposited with the United States Postal Service on the same day with postage thereon fully prepaid at Glendale, California in the ordinary course of business. I am aware that on motion of the party served, service presumed invalid if postal cancellation date or postage meter is more than one day after date of deposit for mailing in affidavit.

Claude M. Stern, Esq. Margret M. Caruso, Esq. Bobbie Eftekar, Esq. Quinn Emanuel Urquhart Oliver & Hedges LLP 555 Twin Dolphin Drive, Suite 580 Redwood Shores, California 94065	
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Place of Mailing: Glendale, California.

Executed on March 12, 2008, at Glendale, California.


Katrina Bartolome